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4 Attorneys for Debtor

6 UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

8 IN RE: CASE No. 10-11533

9 CHAPTER 11
NAVJOT, LLC,

11 Debtor. /

APPLICATION TO EMPLOY ATTORNEY
UNDER GENERAL RETAINER, AFFIDAVIT
OF PROPOSED ATTORNEY TO BE
EMPLOYED UNDER GENERAL RETAINER,
and ORDER AUTHORIZING EMPLOYMENT
OF ATTORNEY UNDER GENERAL
13 RETAINER

14 TO: THE HONORABLE ALAN JAROSLOVSKY, UNITED STATES BANKRUPTCY
15 COURT JUDGE:

16 The Application of Navjot, LLC, Debtor herein, respectfully
17 represents:

18 1. Applicant is the Debtor in the above-captioned Chapter 11
19 proceeding.

20 2. Applicant wishes to retain DAVID N. CHANDLER, p.c., a
21 professional corporation employing attorneys duly admitted to
22 practice in this Court, to represent it as general counsel before
23 this Court in the above-captioned case and provide it assistance
24 relative to the related case.

25 3. To the best of Applicant's knowledge, DAVID N. CHANDLER,
26 p.c., does not have any connection with the Debtor, its creditors or
27 any other party in interest, or their respective attorneys or
28 accountants, the United States Trustee or any person employed in the

1 office of the United States Trustee, and represents no interest
2 adverse to the estate in the matters upon which it is to be
3 retained, except as may be stated in the Affidavit of David N.
4 Chandler, filed herewith.

5 WHEREFORE, it is respectfully requested that the Debtor be
6 authorized to employ DAVID N. CHANDLER, p.c. under a general
7 retainer agreement, to represent Debtor in the above-captioned case
8 before this Court, and that Debtor have such other and further
9 relief as is just and proper.

10 Dated: 4/28/2010

11 /s/ Surinder Pal Sroa
12 SURINDER PAL SROA,
13 Managing Member

14 AFFIDAVIT OF PROPOSED ATTORNEY TO
15 BE EMPLOYED UNDER GENERAL RETAINER

16 DAVID N. CHANDLER, being duly sworn, deposes and says:

17 1. I am an attorney at law, admitted to practice before all
18 courts of the State of California, as well as this Court. I
19 maintain an office at 1747 Fourth Street, Santa Rosa, California.

20 2. Insofar as I have been able to ascertain, I do not, nor
21 does any member/employee of my firm, David N. Chandler, p.c., have
22 any connection with the Debtor herein, its creditors, or any other
23 party in interest or their respective attorneys and accountants, the
24 United States Trustee or any person employed in the Office of the
25 United States Trustee except as stated herein.

26 3. Insofar as I have been able to ascertain, I do not
27 represent any interest adverse to that of the estate of the debtor
28 in the matters upon which I am to be engaged. I have never
29 represented and have no prior contacts with the Debtor herein. I

1 have no connections with any creditors insofar as known and
2 represent no interests and have no interests except as stated
3 herein.

4 4. The connections set forth herein are intended to comply
5 with the disclosure requirements of Section 327 as set forth in In
6 re Park Helena Corp., 63 F.3d 877, 882 (9th Cir. 1995).

7 5. The following connections exist between the Declarant and
8 the Debtor herein:

9 a. The declarant and the Debtor had an attorney client
10 relationship prior to the within Application upon consultation;

11 b. Declarant and Debtor have electronic connections
12 through internet service providers and telephone systems.

13 6. The forgoing connections set forth in paragraph 5 hereof
14 are the only connections known to the Declarant which Declarant has
15 with the Debtor.

16 7. The following connections exist between the Declarant and
17 creditors of the Debtor herein:

18 a. Declarant currently, and has in the past,
19 represent[ed] debtors in unrelated matters who [which] have
20 creditors in common with the Debtor herein and have discharged all
21 or a portion of the claims of such creditors; and

22 b. Declarant has creditors in common with the Debtor,
23 i.e., Pacific Gas and Electric Company, and IRS.

24 8. Declarant has no known connections with any creditor in the
25 case their attorneys or accountants, except as set forth in
26 paragraph 7 hereof.

27 9. Based on the foregoing, I am a disinterested person within
28 the meaning of Section 101(13) and 327 of the Bankruptcy Code.

1 David N. Chandler, p.c. is disinterested.

2 10. I am well qualified to represent the Debtor generally
3 herein, and am willing to accept employment on the basis set forth
4 in the annexed application.

5 11. My hourly rate is \$385.00 per hour for my time, \$285.00
6 per hour for associate attorney time and \$110.00 per hour for
7 paralegal time.

8 12. Affiant has advised the Debtor of my willingness to serve
9 as its counsel under a general retainer based on time and standard
10 billable charges.

11
12 Dated: 4/28/2010

/s/ David N. Chandler

DAVID N. CHANDLER

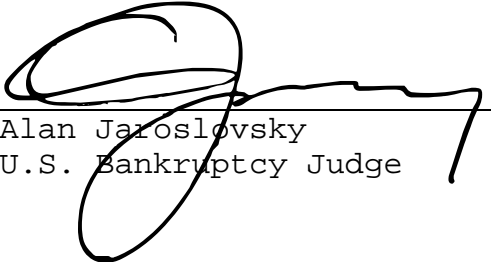
Attorney for Debtor

14 ORDER AUTHORIZING EMPLOYMENT OF
15 ATTORNEY UNDER GENERAL RETAINER

16 Upon the application of Navjot, LLC, the Debtor herein, dated
17 April 28, 2010, for an order authorizing it to employ and retain
18 DAVID N. CHANDLER, p.c. as its attorney under a general retainer,
19 and upon the annexed affidavit of David N. Chandler, sworn to on
20 April 28, 2010, and it appearing that DAVID N. CHANDLER is duly
21 admitted to practice before this court, and the court being
22 satisfied that said attorney, along with his firm, David N.
23 Chandler, p.c., represents no interest adverse to the estate with
24 respect to matters upon which he is to be engaged, that he is a
25 disinterested person under Section 101(13) and 327 of Title 11,
26 United States Code, that his employment is necessary and would be in
27 the best interest of the estate, and sufficient cause appearing
28 therefore:

1 IT IS SO ORDERED that Navjot, LLC, be and is hereby authorized
2 to employ and retain DAVID N. CHANDLER, p.c. as its attorney under
3 a general retainer to perform all of the services set forth in the
4 annexed application, with such compensation as is approved by the
5 court.

6
7 Dated: May 21, 2010


Alan Jaroslovsky
U.S. Bankruptcy Judge